

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HALMAN ALDUBI PROVIDENT AND
PENSION FUNDS LTD., Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

TEVA PHARMACEUTICALS INDUSTRIES
LIMITED, EREZ VIGODMAN, EYAL
DESHEH, ROBERT KOREMANS, MICHAEL
DERKACZ, KARE SCHULTZ, MICHAEL
MCCLELLAN, BRENDAN O'GRADY, and
ELI KALIF,

Defendants.

Civil Action No.: 2:20-cv-04660

Hon. Karen S. Marston

**DEFENDANTS' MOTION TO DISMISS
THE CORRECTED AMENDED COMPLAINT**

Defendants Teva Pharmaceuticals Industries Limited, Erez Vigodman, Eyal Desheh, Robert Koremans, Michael Derkacz, Kare Schultz, Michael McClellan, Brendan O'Grady, and Eli Kalif, by and through their counsel, move to dismiss the Corrected Amended Complaint (ECF No. 64-2), with prejudice, for failure to state a claim upon which relief may be granted in accordance with Federal Rule of Civil Procedure 12(b)(6). In support of this Motion, Defendants submit the attached Memorandum of Law, which is incorporated in full.

Respectfully submitted this 23rd day of August, 2021,

/s/ Mathieu J. Shapiro

Mathieu J. Shapiro (I.D. No. 76266)

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